

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS

JOHN CARR )  
Plaintiff )  
 )  
v. )  
 )  
SIEMENS DEMATIC CORP. )  
AND AMEC CONSTRUCTION )  
MANAGEMENT, INC. )  
Defendants )

CIVIL ACTION NO: 05-10445MLW

**PLAINTIFF'S MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS AND  
FURTHER 30(B)(6) TESTIMONY BY THE DEFENDANT, SIEMENS DEMATIC CORP.**

Pursuant to Rule 37 of the Federal Rules of Civil Procedure, the Plaintiff, John Carr, moves to compel the Defendants, Siemens Dematic Corp. ("Siemens") and AMEC Construction Management, Inc. ("AMEC") to produce documents originally requested for production in February of 2006 and to compel further 30(b)6) testimony. In support hereof, kindly refer to the attached Memorandum and Certification of Counsel.

WHEREFORE, the Plaintiff, John Carr, prays that this Honorable Court grant his Motion to Compel and order Siemens to comply with its discovery obligations.

Respectfully Submitted,  
The Plaintiff, John Carr,  
By his Attorney,

/s/ Brian C. Dever  
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